



Bundesanstalt für Landwirtschaft und Ernährung, 53168 Bonn

To all Nabisy users  
via certification bodies and  
certification systems

via e-mail only

Copies go to the Biofuel Quota Body, the  
General Directorate of Customs and to be  
published on the internet at  
[www.ble.de/biomasse](http://www.ble.de/biomasse)

**12<sup>th</sup> Information letter:  
Upcoming changes due to the revision of the Biofuel Sustainability  
Ordinance (Biokraft-NachV) and the Biomass Electricity Sustainability  
Ordinance (BioSt-NachV).**

523-04.10-5021-Nabisy Newsletter 12 - gut

Bonn, 19.07.2022

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Attachment: csv format for proofs of sustainability

Dear Sir or Madam,

The first legal adjustments of the Nabisy database to the sustainability ordinance that came into force at the beginning of December 2021 mainly affect the Biokraft-NachV.

Today you will receive information about the next stage of expansion of Nabisy. Here it mainly concerns the implementation of the requirements from the BioSt-NachV, as listed below:

1. Issuing of proofs of sustainability for electricity from solid and gaseous biomass by certified last interfaces
  - a. Necessary data of plants for electricity generation
  - b. Date of initial operation of the plant and resulting minimum GHG emission savings required
  - c. Biomass types without data of GHG emissions
  - d. Entering of information on sustainability for last interfaces that produce electricity and whose plant was in operation before 01.01.2021
  - e. One-time transition period for the issuing of proofs of sustainability for electricity from solid and gaseous biomass
2. Changes for plant operators who convert liquid biofuels into electricity

Unsere Servicezeiten:

Montags bis donnerstags von 9:00 bis 12:00 Uhr und von 13:00 bis 16:00 Uhr

Freitags von 9:00 bis 14:00 Uhr

Für den Fall, dass Sie uns gegenüber eine Erklärung elektronisch übermitteln möchten, die formgebunden ist (z. B. in einem Gesetz angeordnete Schriftform), weisen wir auf Folgendes hin: Die Übermittlung mittels einer mit qualifizierter elektronischer Signatur versehenen E-Mail ist ausschließlich an [info@ble.de](mailto:info@ble.de) möglich. Andere E-Mail-Adressen stehen hierfür nicht zur Verfügung. Eine Einreichung mittels De-Mail ist an die im Briefkopf genannte Adresse möglich.

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3. Changes to the csv template for uploading the proofs of sustainability for last interfaces
4. Changes on the proofs of sustainability
  - a. New proofs for the end product electricity
  - b. Changes on all proofs of sustainability
5. Introduction of the function: "Management of new proofs"
6. New list of types of biomass
7. Miscellaneous

### **Re 1. Issuing of proofs of sustainability for electricity from solid and gaseous biomass by certified last interfaces**

The update implements the new area of the BioSt-NachV. This means that proofs of sustainability can be issued for electricity from certified plants. For these proofs, it is not the emissions of the fuel (E) that are the crucial factor, but the emissions of the final product electricity ( $EC_{el}$ ).

$EC_{el}$  is calculated as follows:

$$EC_{el} = \frac{E}{\eta_{el}}$$

Where:

$EC_{el}$  = Total greenhouse gas emissions from the final energy commodity  
E = Total greenhouse gas emissions of the fuel before end-conversion  
 $\eta_{el}$  = The electrical efficiency, defined as the annual electricity produced divided by the annual fuel input, based on its energy content

For this the following changes are necessary:

#### ***Re a. Necessary data of plants for electricity generation***

In order to issue proofs of sustainability, the following data are required for each plant that converts solid or gaseous biomass into electricity:

- Number of the plant, which is deposited in the market core data register (Markstammdatenregister (MaStR)) of the Bundesnetzagentur. As interface, you have the opportunity to rename your plants in Nabisy to be able to distinguish the plants.
- The commissioning date of the plant to check which minimum GHG emission saving is required (see table under No. 1b).
- The efficiency of the plant to calculate the emissions of the electricity generated (see No. 1).

The required data will be collected by the certification body during the audit and then sent to the BLE along with the certificate.

**Re b. Date of initial operation of the plant and resulting minimum GHG emission savings required**

The table shows the required minimum GHG emission savings depending on the date of initial operation of the plant.

Date of initial operation	Minimum GHG emission savings
before 01.01.2021	Not required by law
01.01.2021 – 31.12.2025	70 %
after 01.01.2026	80 %

Nabisy automatically plausibilized the required GHG emission minimum savings for the selected plant. If the minimum saving is not reached, the proof cannot be issued in Nabisy.

**Re c. Biomass types without data of GHG emission**

With the next update of the biomass types, biomass types will be introduced for which no emissions have to be entered.

These biomass types can be used for the issuance of proofs for plants that were in operation before 01.January 2021.

According to § 3 para. 5 BioSt-NachV, no information on GHG emissions are required for electricity produced from municipal solid waste, irrespective of the initial date of operation date.

The biomass types without GHG value are marked accordingly in the list of biomass types. In the production route, these have the addition "without GHG".

**Re d. Entering of information on sustainability for last interfaces that produce electricity and whose plant was in operation before 01.01.2021**

Interfaces that produce electricity but whose plant was in operation before 01.01.2021 are not obligated to provide information on the GHG calculation, but are allowed to do so voluntarily.

If you do not specify emissions, select the correct biomass type ("without GHG") when selecting biomass types.

**Re e. One-time transition period for the issuing of proofs of sustainability for electricity from solid and gaseous biomass**

A proof of sustainability can be issued by an interface within the quarter of delivery plus 30 calendar days grace period. Balancing dates of each calendar year are March 31, June 30, September 30 and December 31 and are therefore quarterly.

Example: The product is delivered on October 1. The corresponding proof of sustainability can be issued until the end of the mass balance period (12/31) plus 30 calendar days grace period (March 31).

Due to the late update, proofs of sustainability for electricity from solid and gaseous biomass for the first to third quarter of 2022 can be entered once/exceptionally until **30.11.2022** in Nabisy.

After that, the above-mentioned deadlines apply again.

## **Re 2. Changes for plant operators who convert liquid biofuels into electricity**

For plant operators who already convert liquid biofuels into electricity, there are also some changes in Nabisy.

Plant operators receive proofs of sustainability from their supplier (interface or supplier) as usual. For liquid biofuels that are converted into electricity, there are no new requirements for minimum GHG emission savings that you as a plant operator need to consider. The electronic forwarding of the proofs to the grid operator is mandatory, as the emission  $E$  is converted into the total GHG emissions by the final energy product  $EC_{el}$  when forwarding the proofs.

For this purpose, the following must be taken into account:

In order to be able to calculate  $EC_{el}$ , Nabisy needs the information of the efficiency of your power plant. To enter this information, your plant(s) must be registered in Nabisy. For each plant the efficiency has to be stated; for better identification a name can be assigned (see also "Manual for plant operators" within the help section in Nabisy).

When submitting the proofs to the network operator the appropriate plant has to be selected. Nabisy then automatically calculates the total greenhouse gas emissions of the final energy product ( $EC_{el}$ ).

If a plant should be replaced, the old plant can be deleted in Nabisy and a new one can be created.

## **Re 3. Changes to the csv template for uploading the proofs of sustainability for last interfaces**

In order to be able to import proofs of sustainability in the electric sector as an interface into Nabisy, it was necessary to adapt the csv format for all proofs of sustainability.

A field (MaStR number of the unit) was added to the end of the dataset.

In case of proofs of sustainability for liquid biofuel and biofuel, this field remains blank.

You will find the current dataset description attached, or it can be requested from the BLE via e-mail to [nabisy@ble.de](mailto:nabisy@ble.de).

#### **Re 4. Changes on the proofs of sustainability**

##### ***Re a. New proofs for the end product electricity***

In the electricity sector, the emissions for the end product electricity ( $EC_{el}$ ) must be issued. Therefore, there will be adapted proofs of sustainability and partial proofs of sustainability for this area. Nabisy will automatically issue these for corresponding cases.

Plant operators that convert liquid biofuels into electricity will receive a proof of sustainability for liquid biofuels with the details of the emissions of the product (E). With the electronic forwarding of the proofs to the network operator Nabisy automatically calculates  $EC_{el}$  with the filed efficiency and the emissions E.

In this case, Nabisy will issue a proof of sustainability of the liquid biofuel with information about  $EC_{el}$ .

##### ***Re b. Changes on all proofs of sustainability***

Due to an increased number of requests, some specifications on the proofs have been made clearer.

On the one hand, after the update, the legal basis will be stated for some information. On the other hand, inventory proofs containing  $e_{ee}$  will contain more precise information on the expected emissions at the time of placing on the market.

#### **Re 5. Introduction of the function: "Management of new proofs"**

In recent years, there has been a steady increase in the number of applications for cancelling proofs that were issued incorrectly and that needed to be corrected.

Therefore, a function to check the proofs of sustainability by the first recipient before accepting them is established.

On this basis the first recipient, usually a trader, must actively accept the proofs in order to be able to use them. Incorrect proofs can be rejected.

For this purpose, the recipient has a time limit of 20 calendar days in the case of biofuel and liquid biofuels and 400 calendar days in the case of electricity of gaseous and solid biofuels. The difference results from the fact that the proofs for electricity of gaseous and solid biofuels are usually directly issued to a network operator who once a year makes the accounting.

If the BLE concludes that other time periods are more practical, it reserves the right to change the time periods and communicate it via its email list.

If the recipient does not take action within the time period, the proofs of sustainability will be automatically rejected.

We inform the interfaces about the status of the proofs they issue by means of the account statement, which has been extended accordingly.

As an interface, please note: If a proof has been (automatically) rejected, for instance it was incorrect, you will not be able to create a proof using the same proof number. We recommend here, for example, an extension of the proof number by "-01" or "-a".

## **Re 6. New list of types of biomass**

The list of types of biomass will be completely revised.

New biomass codes are filed for the electricity sector. In addition, existing biomass codes will also be revised. With the update, all existing codes for the reissue of proofs will be deactivated. Proofs issued with previous biomass codes do not have to be changed, but can be reused in the trade chain.

As a last interface, please inform yourself about the new codes early. We will publish the list in the help section of Nabisy.

Please note:

Old codes will not be reactivated for input!

## **Re 7. Miscellaneous**

### *1. Issuing proofs of sustainability subsequently*

Recently, there has been an increasing number of inquiries and applications for issuing belated proofs of sustainability. This could be requested informally as an exception for special cases.

As of 01.09.2022 (date of receipt by BLE), only applications will be accepted that are made using the new forms. You will find the application forms in the help section of Nabisy.

We explicitly point out that this procedure still is an exception. Please pay attention that the proofs of sustainability still have to be issued to a timely issuing.

### *2. Applications for access to Nabisy*

The application forms for access to Nabisy have been revised and were made available to the Voluntary Schemes.

In this context we point out that now also applications for access to Nabisy for electricity producing last interfaces can be filed.

In order to do so, please contact your Voluntary Scheme. The appropriate application forms are available there.

Please return the completed application form to your Voluntary Scheme.

The voluntary scheme will send your application along with further information to us.

Only after all necessary data are available, the processing will take place.

The username and password will then be sent to you separately by post.

### 3. Trainings for Nabisy

The BLE will offer various online training sessions / presentations regarding Nabisy. These are expected to last approximately 2 to 2.5 hours and will be offered to different user groups on different days:

- Last Interfaces producing fuels or liquid biofuels.
  - [15.08.2022](#) [09:30](#)
  - [06.09.2022](#) [14:00](#)
  - [22.09.2022](#) [09:30](#) English session
- Last Interfaces that convert solid or gaseous biomass into electricity
  - [15.08.2022](#) [14:00](#)
  - [23.08.2022](#) [09:30](#)
  - [23.08.2022](#) [14:00](#)
  - [06.09.2022](#) [09:30](#)
- Traders after the last interface
  - [16.08.2022](#) [09:30](#)
  - [08.09.2022](#) [14:00](#)
  - [23.09.2022](#) [14:00](#) English session
- Plant operators who convert liquid biomass into electricity
  - [17.01.2023](#) [15:00](#)
- Grid operators
  - [25.08.2022](#) [14:00](#)
  - [11.10.2022](#) [14:00](#)

To register, please click on the corresponding date.

For each event a maximum of 50 registrations will be accepted.

We reserve the right to cancel the event at short notice if there are too few registrations.

The next update is scheduled for the **01. August 2022**.

On this day, Nabisy will not be available. In case Nabisy is out of service for a longer period, we will announce this accordingly.

With kind regards

By order

gez. Kinkel